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3 District of Nevada
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11 Attorneys for Defendant

12 **UNITED STATES DISTRICT COURT**

13 **DISTRICT OF NEVADA**

14 KELLY J. ANDERSON,)
15 Plaintiff,) Case No. 2:17-CV-01177-RFB-GWF
16 v.)
17 NANCY A. BERRYHILL,) **JOINT STIPULATION AND ~~PROPOSED~~**
18 Acting Commissioner of Social Security,) **ORDER FOR EXTENSION OF TIME TO**
19 Defendant.) **RESPOND TO PLAINTIFF'S MOTION FOR**
20 **REVERSAL AND/OR REMAND**

21 IT IS HEREBY STIPULATED, by the parties, through their respective counsel of record, that
22 the time for responding to Plaintiff's Motion for Reversal and/or Remand be extended for thirty days
23 from December 20, 2017 to January 17, 2018. This is Defendant's second request for extension.
24 Good cause exists to grant Defendant's request for extension. Counsel was unexpectedly out sick with
25 the flu and became behind on her caseload. Additional time is required as Counsel has over 75 active
26 pending matters, of which require 2+ responses to dispositive motions per week until mid-January. In
addition, Counsel has three pending Ninth Circuit matters, which require additional levels of review.

1 Counsel is also expected to take some time off for the upcoming holidays. Due to current workload
2 demands and shortened staff, Counsel needs additional time to adequately review the transcript and
3 properly respond to Plaintiff's Motion for Summary Judgment. Defendant makes this request in good
4 faith with no intention to unduly delay the proceedings. The parties further stipulate that the Court's
5 Scheduling Order shall be modified accordingly.
6

7 Respectfully submitted,
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9

10 Dated: December 14, 2017

/s/ *Daniel Jones

(*as authorized by email on November 20, 2017)
11 DANIEL JONES
Attorney for Plaintiff

12 Dated: December 14, 2017

13 STEVEN W. MYHRE
14 Acting United States Attorney
15 DEBORAH LEE STACHEL
16 Regional Chief Counsel, Region IX
Social Security Administration

17 By

/s/ Tina L. Naicker
18 TINA L. NAICKER
19 Special Assistant U.S. Attorney
Attorneys for Defendant

20
21 **ORDER**

22 APPROVED AND SO ORDERED:

23
24 DATED: 12/15/2017


25 HON. GEORGE FOLEY, JR
26 UNITED STATES MAGISTRATE JUDGE